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Willie Grieve Vice-President Telecom Policy & Regulatory Affairs

February 6, 2006

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Dear Ms. Dortch:

Re: EB Docket No. 06-36; EB-06-TC-060, Certification of CPNI Filing of TELUS Communications Inc.

Enclosed is the CPNI compliance certificate of TELUS Communications Inc. in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on February 2, 2006. The Enforcement Bureau has requested the compliance certificate as required by section 64.2009(e) of the Commission's rules.

Please contact me with any questions or concerns.

Yours truly,

Willie Grieve Vice-President

Telecom Policy and Regulatory Affairs

KD/cs

Cc: Byron McCoy, byron.mccoy@fcc.gov

Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

TELUS COMMUNICATIONS, INC. CPNI COMPLIANCE CERTIFICATE February 6, 2006

- 1. I am Willie Grieve, an officer of TELUS Communications Inc. ("TCI"). My title is Vice President of Telecom Policy & Regulatory Affairs. I am making this compliance certification pursuant to section 64.2009(e) of the Commission's rules. The purpose of this certification is to verify TCI's compliance with the Commission's regulations regarding TCI's maintenance, use and protection of customer proprietary network information ("CPNI").
- 2. I have personal knowledge that TCI has established operating procedures that are adequate to ensure compliance with the FCC's CPNI rules and that the statements in the accompanying "Statement of CPNI Operating Procedures" are correct.

Willie Grieve

Vice President

Telecom Policy & Regulatory Affairs

TELUS COMMUNICATIONS, INC. STATEMENT OF CPNI OPERATING PROCEDURES February 6, 2006

- 1. TELUS Communications Inc. ("TCI") is a telecommunications carrier that operates primarily in Canada but which also provides telecommunications services, primarily wholesale telecommunications services to U.S. carriers and service provider and service extensions (e.g., private line, frame relay services) to Canadian customers with branch offices in the United States.
- 2. TCI uses, accesses and/or discloses CPNI relating to U.S. customers and/or the telecommunications services that TCI provides to customers with locations in the United States for the following purposes:
 - (A) for the provision of the telecommunications service from which such information is derived, or
 - (B) for the provision of services necessary to, or used in, the provision of such telecommunications service, including the publishing of directories; or,
 - (C) for the following limited purposes:
 - (1) to initiate, render, bill, and collect for telecommunications services;
 - (2) to protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services;
 - (3) to provide any inbound telemarketing, referral, or administrative services to the customer for the duration of the call, if such call was initiated by the customer and the customer approves of the use of such information to provide such service; and,
 - (4) to provide call location information concerning the user of a wireless services -
 - (i) to a public safety answering point, emergency medical service provider or emergency dispatch provider, public safety, fire service, or law enforcement official, or hospital emergency or trauma care facility, in order to respond to the user's call for emergency services;
 - (ii) to inform the user's legal guardian or members of the user's immediate family of the user's location in an emergency situation that involves the risk of death or serious physical harm; or
 - (iii) to providers of information or database management services solely for purposes of assisting in the delivery of emergency services in response to an emergency.

- 3. TCI does not use, access or disclose CPNI relating to U.S. customers and/or the telecommunications services that TCI provides to customers located in the United States for marketing purposes. In particular, TCI does not use, access or disclose CPNI relating to U.S. customers and/or the telecommunications services that TCI provides to customers located in the United States for the purpose of its sales and marketing campaigns nor to conduct outbound marketing. Use, access to, or disclosure of CPNI relating to U.S. customers and/or the services that TCI provides to customers located in the United States for marketing purposes has been expressly identified as a non-legitimate business purpose.
- 4. TCI has implemented privacy and other ethical policies and procedures that restrict and prohibit its personnel from accessing and/or making use of customer data or information (including CPNI) for purposes other than legitimate business purposes, and personnel are trained in relation to these policies and procedures, as well as disciplined when they found to be in non-compliance with these policies and procedures.
- As TCI does not use, access and disclose such CPNI for marketing purposes, TCI
 respectfully submits that it has established the appropriate safeguards for this type
 of treatment (non-use) of CPNI data.